

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

PETITION AND COMPLAINT OF KENTUCKY	)	
POWER COMPANY FOR A DECLARATION OF	)	
ITS EXCLUSIVE RIGHT PURSUANT TO KRS	)	
278.018(1) TO SERVE THOSE PORTIONS OF	)	CASE NO.
THE SAND GAP ESTATES IN GREENUP	)	2012-00224
COUNTY, KENTUCKY LYING WITHIN ITS	)	
CERTIFIED TERRITORY IN LIEU OF	)	
GRAYSON RURAL ELECTRIC COOPERATIVE	)	
CORPORATION	)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION  
TO KENTUCKY POWER COMPANY

Kentucky Power Company ("Kentucky Power"), pursuant to 807 KAR 5:001, is to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due within ten days of the issuance of this request. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Kentucky Power shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Kentucky Power fails or refuses to furnish all or part of the requested information, Kentucky Power shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request

1. In response to Item 14(b)(3) from Kentucky Power Company's Response to Commission Staff's First Request for Information, Kentucky Power stated that it was aware that the Horizontal Positional Accuracy Explanation (<horizpar> in the xml file), of the electric service area boundaries provided by the Public Service Commission was  $\pm$  100 feet. Revise Map 1 (from Kentucky Power Company's Response to Commission Staff's First Request for Information, Response to Item 8) by overlaying a 100-foot buffer around the electric service area boundary line provided by the Kentucky Public Service Commission. ( $\pm$  100 feet means that the buffer area extends 100 feet on each side of the line). Does the blue line compiled by Kentucky Power from the signed U.S. Geological Survey ("USGS") map filed with the Kentucky Public Service Commission, as shown on Map 1, fall within the  $\pm$  100-foot buffer that surrounds the electric service area boundary line provided by the Kentucky Public Service Commission?

2. Taking into account the accuracy of the original USGS topographic map, the distortion in the paper, the width of the electric service area boundary line, and any inherent errors in the original compilation of the boundary line on the USGS map:

a. What is Kentucky Power's estimate of the horizontal positional accuracy on the ground of the blue line (compiled by Kentucky Power from the signed USGS map filed with the Kentucky Public Service Commission) as shown on Map 1?

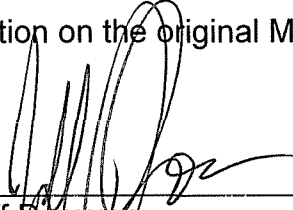
b. If the estimate of horizontal positional accuracy of the boundary line compiled by Kentucky Power as described in a. above is different from  $\pm 100$  feet, explain how Kentucky Power arrived at a different value.

c. Illustrate this as an overlay to Map 1 (from Kentucky Power Company's Response to Commission Staff's First Request for Information, Response to Item 8).

3. In response to Item 14(c) from Kentucky Power Company's Response to Commission Staff's First Request for Information, Kentucky Power stated that the aerial imagery is from Google Maps dated 4/14/2011. Statewide imagery available from the Commonwealth of Kentucky's Division of Geographic Information through the Kentucky Geography Network has a known pedigree and accuracy.

a. Make a map at 1 inch = 200 feet scale using the Kentucky imagery as the background for the electric service area boundaries and the 100-foot buffer.

b. Is the position of the electric service area boundary different with respect to the residences on this map from its position on the original Map 1?<sup>1</sup>



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DATED JAN 11 2013

cc: Parties of Record

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<sup>1</sup> The Kentucky imagery is available on the internet. Go to the Kentucky Geography Network (<http://www.kygeonet.ky.gov/>). In the upper right corner of the web page, there is the statement: "Kentucky's 2012 1-Meter NAIP Imagery from the USDA is now available for download by 20k tile and can be accessed via an Image Service." Clicking on "download" provides the metadata for the 2012 imagery. Note that the information provided describes the accuracy and the projection history of that imagery. To download the imagery for the Sand Gap area, click on the link to [ftp://ftp.kymartian.ky.gov/FSA\\_NAIP\\_2012\\_1M/](ftp://ftp.kymartian.ky.gov/FSA_NAIP_2012_1M/), then find and save the file [ky\\_1m\\_naip\\_2012\\_N016E100.zip](ftp://ftp.kymartian.ky.gov/fsa/ky_1m_naip_2012_N016E100.zip). The tile system is found in [fsa\\_grid\\_shapefile.zip](ftp://ftp.kymartian.ky.gov/fsa/) at <ftp://ftp.kymartian.ky.gov/fsa/>.

Case No. 2012-00224

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